

00477.20938/MGD-VMC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

---

PATRICIA A. CHAMBLISS and  
THOMAS F. CHAMBLISS,

Plaintiffs,

vs.

Docket No. 21-cv-01136-STA-jay

FELIPE MARTINEZ, IV;  
LUEBE-JONES, INC.;  
AVADEK, INC.;  
AVADEK, INC. d/b/a LUEBE-JONES, INC.;  
PERFECTION ARCHITECTURAL SYSTEMS, LLC; and  
ENTERPRISE FM TRUST,

Defendants.

---

**JOINT STIPULATION OF DISMISSAL**

---

IT IS HEREBY STIPULATED AND AGREED by and between the Parties and/or their respective counsel that the above styled matter is voluntarily dismissed, with prejudice, in its entirety, including but not limited to, all claims against the Defendants, Felipe Martinez, IV; Luebe-Jones, Inc.; Avadek, Inc.; Avadek, Inc. d/b/a Luebe-Jones, Inc.; Perfection Architectural Systems, LLC; and Enterprise FM Trust, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. The parties agree that the costs of Court are to be taxed to the Defendants, for which let execution issue. Each party will pay its own discretionary costs.

RESPECTFULLY SUBMITTED this the 2<sup>nd</sup> day of May, 2022.

s/ R. Deniger Cobb, Jr.

GLENN K. VINES, JR. (#19637)  
R. DENIGER COBB, JR. (#35084)  
NAHON SAHAROVICH & TROTZ, PLC  
488 South Mendenhall  
Memphis, Tennessee 38117  
(901) 683-7000  
[gvines@nstlaw.com](mailto:gvines@nstlaw.com)  
[dcobb@nstlaw.com](mailto:dcobb@nstlaw.com)

**Attorneys for Plaintiffs**

s/ Vickie Moffett Cruzen

MICHAEL G. DERRICK (#14820)  
VICKIE MOFFETT CRUZEN (#24609)  
SHUTTLEWORTH PLLC  
6077 Primacy Parkway, Suite 200  
Memphis, Tennessee 38119  
(901) 526-7399  
[mderrick@swlawpllc.com](mailto:mderrick@swlawpllc.com)  
[vmoffettcruzen@swlawpllc.com](mailto:vmoffettcruzen@swlawpllc.com)

**Attorneys for Defendants**